

Steven Masiello (*admitted pro hac vice*)
Sean D. G. Camacho (*admitted pro hac vice*)

DENTONS US LLP

1400 Wewatta Street, Suite 700
Denver, CO 80202
steven.masiello@dentons.com
sean.camacho@dentons.com

Gale Monahan (*admitted pro hac vice*)

DENTONS US LLP

2000 McKinney Ave., Suite 1900
Dallas, TX 75201
gale.monahan@dentons.com

Paul J. Anderson (NV SBN 709)

MAUPIN, COX & LEGOY

4785 Caughlin Parkway
P.O. Box 30,000
Reno, NV 89519/89520 (P.O. Box)
panderson@mcllawfirm.com

Attorneys for Defendants SOC Nevada, LLC d/b/a SOC LLC and Tre'Quis Harris

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ESTATE OF NEKIYLO DEWAYNE GRAVES, by
and through Eureka Graves as next-of-kin, personal
representative and Special Administrator
SHANNON L. EVANS; EUREKA GRAVES, an
individual,

Plaintiffs,

vs.

NYE COUNTY, NEVADA, a political subdivision
of the State of Nevada, JOHN KAKAVULIAS, an
individual and employee of Nye County, Nevada;
SOC NEVADA, LLC, a foreign limited liability
company d/b/a SOC, LLC; TREQUIS HARRIS, an
individual and employee of SOC Nevada, LLC;
DOES I -X; ROES I-X,

Defendants.

Case No. 2:20-cv-02359-CDS-DJA

**FIRST JOINT STIPULATION TO
EXTEND DEFENDANTS SOC LLC'S
AND TRE'QUIS HARRIS' TIME TO
REPLY IN SUPPORT OF THEIR
MOTION TO DISMISS PLAINTIFFS'
FIRST AMENDED COMPLAINT**

Under Fed. R. Civ. P. ("FRCP") 6 and this Court's Local Rules ("LR") of Practice LR IA 6-1
and LR 7-1, Plaintiffs and Defendants, SOC LLC ("SOC") and Tre'Quis Harris ("Harris"), jointly
with SOC (the "Defendants"), stipulate, subject to this Court's approval, to extend by 14 days to June
8, 2022, the time for the Defendants to file their reply ("Reply") in support of their Motion to Dismiss

[ECF No. 69]. In support of this Stipulation, the Parties state:

1. Plaintiffs filed their Complaint [ECF No. 1] on December 31, 2020.
2. Plaintiffs filed their First Amended Complaint [ECF No. 35] on December 2, 2021.
3. On February 1, 2022, Defendants filed their redacted Motion to Dismiss Plaintiffs First Amended Complaint (“Motion”) [ECF No. 69].
4. On March 31, 2022, the Defendants filed an unredacted copy of the Motion [ECF No. 89].
5. On April 29, 2022 [ECF No. 91], and May 13, 2022 [ECF No. 93], Plaintiffs filed the First and Second Stipulations for Extension of Time, respectively, which this Court granted [ECF Nos. 92 and 94] making the Plaintiffs’ deadline to respond to the Motion May 18, 2022.
6. On May 17, 2022, Plaintiffs filed the Motion for Leave to File Excess Pages [ECF No. 95], allowing the Plaintiffs to file a 45-page response (“Response”), which this Court granted on May 18, 2022 [ECF No. 97].
7. On May 18, 2022, the Plaintiffs filed their 45-page Response and a 1,196-page exhibit.
8. Defendants’ deadline to file the Reply is May 25, 2022.
9. Plaintiffs’ 45-page Response raises numerous legal issues and arguments that must be analyzed and addressed. Furthermore, the Defendants need more time to review the 1,196-page exhibit and prepare a Reply.
10. Accordingly, the Parties agree that good cause exists to support this request for a 14-day extension to June 8, 2022, for the Defendants to file their Reply.

WHEREFORE, the parties respectfully request this Court approve this Stipulation.

Respectfully, submitted this 20th day of May, 2022.

1 /s Paul S. Padda

2 Paul S. Padda, Esq.

3 **PAUL PADDA LAW**

4 4560 South Decatur Blvd., #300

5 Las Vegas, Nevada 89103

6 *Attorneys for Plaintiffs*

/s Paul J. Anderson

Steven Masiello (*admitted pro hac vice*)

Sean D. G. Camacho (*admitted pro hac vice*)

DENTONS US LLP

1400 Wewatta Street, Suite 700

Denver, CO 80202

steven.masiello@dentons.com

sean.camacho@dentons.com

Gale Monahan (*admitted pro hac vice*)

DENTONS US LLP

2000 McKinney Ave., Suite 1900

Dallas, TX 75201

gale.monahan@dentons.com

Paul J. Anderson (NV SBN 709)

MAUPIN, COX & LEGOY

4785 Caughlin Parkway

P.O. Box 30,000

Reno, NV 89519/89520 (P.O. Box)

panderson@mcllawfirm.com

*Attorneys for Defendants Tre'Quis Harris
and SOC Nevada, LLC*

16 **IT IS SO ORDERED:**

17 
18 **UNITED STATES DISTRICT JUDGE**

19 **DATED:** May 24, 2022
20
21
22
23
24
25
26
27
28